

RM-10870 Comments --- NCVEC Proposal

FCC Chairman Powell, Commissioners, and Wireless Telecommunications Bureau:

Eliminating Morse code completely is not rational thinking. Some Morse code must remain, even at 5 wpm, in the amateur radio licensing process/protocol.

The new proposed "Communicator" license is a solid workable concept. Grandfathering the present Novice class licensees to the Communicator license is logical and reasonable. A more reasonable power limit would be 50 watts on bands below 24 MHz and 25 watts on bands above 24 MHz, etc.

The proposal to grandfather all advanced class to extra class is again flawed. The NCVEC proposal also recommends grandfathering thousands of Advanced class amateurs to Extra class; many of whom are the same radio amateurs that were previously grandfathered from General class to Advanced class. If the FCC approves the NCVEC proposal as submitted, those amateurs will have been grandfathered from General class to Advanced class and then grandfathered again to Extra class without demonstrating qualification by examination at either license class. Double grandfathering is inappropriate and unacceptable.

Thoughts Relating to an Appropriate Ruling --- 3 classes of Amateur Radio License

The appropriate ruling for the Amateur Radio Service would be to grandfather those Advanced class licensees that have previously passed the Advanced class examination to Extra class; justified by the previous similarity of the examination content.

Permit those current Advanced class radio amateur licensees that were previously grandfathered from General class to Advanced class to remain at Advanced class until they upgrade to Extra by examination.

This will reduce the Advanced licensee census, thus reducing the administrative load.

Likewise, grandfather all Technician plus/Technician HF class licensees to General. Require 5 wpm Morse code to General (if Element 1 was not previously passed) and 10 wpm to Extra class. Morse code requirement(s) are justified to ensure appropriate motivation, skill, intent, and practices of each operator in the Amateur Radio Service.

Grandfathering Technician to General would depend upon where the requirement for the Morse code examination is placed. If nothing else, at least 5 wpm Morse code at some point in the licensing process.

Present Novices are grandfathered to the new Novice or Communicator license, or however designated license.

This is the fairest and most appropriate plan for the future of the Amateur Radio Service. It provides the most incentive for upgrading. This will reduce the number of license classes to three, ultimately the reducing the administrative load.

Eliminate the present question pools and the NCVEC write new questions. Then ARRL, W5YI, Gordon West Radio School, and the likes can prepare legitimate study

guide texts. The study guide texts will contain NO test questions. The study guide text authors must not write the study guides from the actual questions.

Band, spectrum, mode, and power output privileges must be proportional to the class of license. Incentive is generated with significant increases in band, mode, and power output privileges for each license class. Minor differences between the band, spectrum, mode, and power output privileges for each license class will not result in sufficient incentive/motivation to upgrade.

It is imperative that the Amateur Radio Service require challenging standards in the licensing and upgrade process to ensure the quality of the Amateur Radio Service in the United States. Another Citizens Band Radio-type fiasco is unacceptable.

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